

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

SHANNA GROVE,

Plaintiff,  
v.

**Case No. 1:21-cv-00354**  
Hon. Hala Y. Jarbou

WZZM a/k/a WZZM-TV a/k/a WZZM13,  
TEGNA, INC., and COMBINED  
COMMUNICATIONS OF OKLAHOMA, LLC,

Defendants.

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**STIPULATED MOTION TO ADJORN THE FINAL PRETRIAL CONFERENCE  
AND TRIAL DATES**

Plaintiff SHANNA GROVE (“Plaintiff”) and Defendants WZZM a/k/a WZZM-TV a/k/a WZZM13, TEGNA, INC., and COMBINED COMMUNICATIONS OF OKLAHOMA, LLC (“Defendants”), through their respective attorneys, respectfully move this Court to enter an order to adjourn the final pretrial conference and trial dates until after a ruling on Defendants’ pending summary judgment motion. In support of their motion, the parties state as follows:

1. On July 8, 2021, a case management order was entered by District Judge

Maloney setting the following case dates: (1) a discovery close of January 18, 2022; (2) a dispositive motion deadline of March 15, 2022; (3) a settlement conference before Magistrate Judge Kent for August 11, 2022; (4) a final pretrial conference set for September 12, 2022 before Judge Maloney; and (5) a jury trial set for October 4, 2022 before Judge Maloney. (Dkt. #15.)

2. On October 19, 2021, the case was reassigned from Judge Maloney to this Court. (Dkt. # 19.)

3. On December 27, 2021, this Court extended the time to complete discovery until March 19, 2022 and to file a dispositive motion until May 17, 2022. (Dkt. # 25.) The other dates (including final pretrial conference and trial) were not similarly extended by approximately two months at that time.

4. Defendants filed a motion for summary judgment on May 17, 2022, addressing all claims in the case (Dkt. #26). As of July 12, 2022, that motion is fully briefed. (Dkt. #26, #33, and #34.)

5. On August 1, 2022, the settlement conference previously set for August 11, 2022 was rescheduled to September 1, 2022. (Dkt. #35.)

6. In light of the pending motion for summary judgment that would dispose of all issues in the case if granted, while Plaintiff denies summary judgment is appropriate, both parties desire to extend the final pretrial conference and trial dates (if they remain necessary) until after the Court's ruling on the motion for summary judgment. The parties invested a great deal of time and expense in the summary judgment process, and desire to save their respective clients from further time and expense that would be required to prepare for the final pretrial conference and trial, which may be unnecessary should the motion for summary judgment be granted. Judicial economy is served by granting this extension.

7. Accordingly, the parties respectfully request that the Court adjourn the final pretrial conference date, currently set for September 12, 2022, and the trial date, currently set for October 4, 2022, and reset the dates associated (e.g. deadline to file motions in limine), if needed, following a ruling on the pending summary judgment motion.

8. This is the parties' first request to continue the final pretrial conference and trial dates. The parties make this request jointly in the interest of justice and not for the purpose of delay. No admissions should be construed by this stipulated motion, and no party will be prejudiced by the relief requested herein.

WHEREFORE, the parties jointly and respectfully request that the Court enter an order adjourning the final pretrial conference and the trial dates pending a ruling on the summary judgment motion.

**Dated:** August 15, 2022

Respectfully submitted,

/s/ James C. Baker

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/s/ Noreen H. Cull

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on August 15, 2022, she served a copy of the foregoing document electronically using the Court's CM/ECF system, which will automatically generate notice of this filing to all Counsel of Record.

/s/Noreen H. Cull